

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

MOOG, INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and DOES NOS.  
1-50.

Defendants.

Civil Action No.  
1:22-cv-00187-LJV-JJM

**DECLARATION OF GABRIEL S.  
GROSS IN SUPPORT OF  
MOTION TO COMPEL TRADE  
SECRET IDENTIFICATION**

I, Gabriel S. Gross, under penalty of perjury and pursuant to 28 U.S.C. § 1746,  
declare as follows:

1. I am an attorney with Latham & Watkins LLP, counsel to Defendant Skyryse, Inc.

I am familiar with this matter and the facts set forth herein.

2. I submit this Declaration in support of Skyryse's Motion to Compel Trade Secret  
Identification.

3. Attached as Exhibit A is a true and correct copy of Moog Inc.'s Responses to  
Defendant Skyryse, Inc.'s First Set of (Expedited) Interrogatories, dated April 13, 2022.

4. Attached as Exhibit B is true and correct copy of a letter served by counsel for  
Skyryse on May 26, 2022.

5. Attached as Exhibit C is a true and correct copy of a letter served by counsel for  
Moog on May 27, 2022.

6. Attached as Exhibit D is a true and correct copy of email correspondence from  
counsel for Moog dated June 6, 2022.

7. Attached as Exhibit E is a true and correct copy of email correspondence from counsel for Moog dated June 10, 2022.

8. Attached as Exhibit F is true and correct copy of a letter served by counsel for Moog on April 19, 2022.

9. On at least May 20, 2022, May 31, 2022, and June 9, 2022, counsel for Skyryse met and conferred with counsel for Moog to discuss, among other issues, Moog's unwillingness to identify its alleged trade secrets with particularity. These discussions are reflected in the written correspondence between counsel, described above.

Dated: June 21, 2022

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*s/ Gabriel S. Gross*  
Gabriel S. Gross